

From: Johnson, Sheron
Sent: Tuesday, October 29, 2013 12:16 PM
To:
Cc:
Subject: Application of Classification Standard for Government Information Series, GS-0306
Attachments: Application of Government Information Series GS-306 (Summary)

Hello!

On March 09, 2012, the Office of Personnel Management (OPM) issued a final Position Classification Flysheet for Government Information Series, 0306. This occupation promotes transparency as well as accountability in providing American citizens with easier access to more Government information.

The Government Information Series, GS-0306 covers work involved in establishing, disseminating, or managing Government information, including two distinct functions: administration of the Freedom of Information Act (FOIA) and of the Privacy Act. Agencies are responsible to classify positions performing these functions in this final occupational series. Associated support work is not covered by this occupation. OPM has provided a series definition, titling instructions, and grading criteria for non-supervisory positions meeting the requirements as described.

This message is to notify you that our office is finalizing our review of current position descriptions of employees in administrative positions with primary duties involving FOIA and/or the Privacy Act. We have applied the new classification standards and are providing you with the results (see attached).

The report contains employees in positions that require a series and title change to the Government Information Specialist, GS-0306. However, the position descriptions require review and revisions by your office before this can be accomplished. We are requesting that supervisors review and revise the position descriptions and submitted to our office by December 15, 2013. Upon receipt of the updated and revised position descriptions, we will establish an effective date to change the employee's series and title to the Government Information Specialist, GS-0306, as applicable. Employees will be notified of the changes by separate e-mail when the Notification of Personnel Action, SF-50 is placed in their Electronic Personnel File (eOPF). An SF-52 is not required by the Program Office to effect the change. If applicable, please notify affected unions of the impending changes.

If you have any questions, please contact _____ at _____

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Application of Government Information Series, 306

Org. Code/Name	Empl; Posn; PD #	Preliminary Comments/Action Taken	Action Needed/Completed
90910112 R9/Web & Internal Communication	Supervisory Public Affairs Specialist GS-1035-14 PD#00017799	Position involves FOIA management; however these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD
90910112 R9/Web & Internal Communication	Program Analyst GS-343-13	Position involves project development of FOIA; however, this is only one of eight major duty statements and is not the primary focus of the position. No change in series is required.	Standards citation annotated on PD
90910112 R9/Web & Internal Communication	Freedom of Information Assistant GS-303-09 PD#0059832	<p>Position consists solely of FOIA work; receiving requests; contacting the requestor if additional clarification is needed and discuss availability of documents; provides substantive assistance to various offices in responding to FOIA requests; provides guidance to management officials on procedures, policies, and statutes applicable to FOIA; assists program officials in responding to requests when information is to be redacted or denied. Provides assistance in the development of written guidelines for dissemination throughout the Region.</p> <p>Concerns with the PD of Record: -The classification of the position is questionable as a GS-0303-09 (one-grade interval). Factor I indicates that the work requires skill in applying analytical and evaluative techniques to the identification, consideration, and resolution of issues or problems of a procedural nature. It would appear that the incumbent is involved in resolving problems of a <u>substantive</u>, in addition to, procedural nature. Advising managers on policies and statutes regarding FOIA is more substantive than procedural. Providing assistance to managers</p>	<p>Recommend the PD is reviewed for accuracy and is updated.</p> <p>This position should be changed to Government Information Specialist, GS-306-9 for two reasons: (1)Correction of a classification error (2)Application of the 306 series</p>

		<p>on when it is appropriate to disclose or withhold information is substantive in nature. Reviewing responses to determine if they are "complete" and appropriately comply with regulations and policies is substantive in nature. Preparing written guidelines for dissemination throughout Region 9 on implementation of the FOIA program is substantive in nature. The above supports that the position should have originally been allocated to the GS-301 rather than GS-303 series given a grade of GS-9.</p> <p>-Factor 1 information is questionable. It is not clear how the work requires knowledge of theory and principles of management, or the ability to use qualitative and quantitative analytical techniques. There are not duties that require this knowledge.</p>	
90950901 R9/Information Resources Branch	Records Management Specialist GS-301-13 PD#00002509	Position involves Privacy Act compliance; however, the focus of the position is records management. No change in series is required	Standards citation annotated on PD

Application of Government Information Series, 306

Org. Code/Name	Empl; Posn; PD #	Preliminary Comments/Action Taken	Action Needed/Completed
91024000 R10/Infrastructure and Operations Unit	Program Analyst GS-343-13 PD#00069223	Position involves support for FOIA responses; however, these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD

Application of Government Information Series, 306

Org. Code/Name	Empl; Posn: PD #	Preliminary Comments/Action Taken	Action Needed/Completed
61010005 OAR/Immediate Office, Asst Admin. For Air & Radiation	Air and Radiation Liaison Specialist GS-301-13 PD#00047124	Serves as OAR's FOIA Coordinator and Office Expert; however these duties consist of only one major duty out of a total of seven other major duties. No change in series is required.	Standards citation annotated on PD
62071100 OAR/Management Operations Staff	Program Analyst GS-343-12 PD#00026502	Tracks FOIA requests and coordinates FOIA replies; however these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD
63012006 OAR/Central Operations & Resources	Administrative Specialist GS-301-11 PD#00017513	Conducts international audits of Division FOIA records; however these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD
63013006 OAR/Policy Analysis & Communication	Program Management Analyst GS-343-12 PD#00047981	Position does have FOIA responsibility; however these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD
63055005 OAR/Community & Tribal Programs Group	Communications Specialist GS-301-11 PD#0064375	Position manages all FOIA requests for the Division (not just the Group); serves as principle POC for Congressional correspondence; manages the Correspondence Management System for the Division; functions as liaison between OAQPS and other organizations and public in response to requests for information; tracks regulation proposals, policies, reports to Congress, scientific articles to ensure required reviews, sign-offs, and approvals. Concerns with PD of Record: -Factor 1 indicates that the position requires "Comprehensive knowledge of the Agency's planning, programming, and budgeting regulations and requirements of Federal and Agency	The type of work performed is covered by the new GS-306 occupational series. It is recommended that the PD is revised to reflect appropriate knowledge requirements. A title and occupational series change is required based on the application of new OPM classification standards.

		<p>administrative laws in order to facilitate effective program planning and program operations." There is not anything within the duties of the job to support this. The position does not have planning, programming, or budgeting responsibilities. Recommend this is deleted.</p> <p>-The following knowledge is required for the position, is not included in Factor, and needs to be added: Knowledge of the regulations, policies, and rules pertaining to the release of information under FOIA sufficient to research, analyze, and evaluate information for response to requests; assemble and review proposed FOIA release packages; to review and analyze appeals from denials of access to records requested under FOIA; to recommend release or non-release of records; to advise management officials on how to properly handle difficult situations; to participate in policy agency policy meetings for purposes of developing policy guidance to be followed within the Division; to monitor response to FOIA requests to make determinations of quality of response and timeliness.</p> <p>Knowledge of internal protocols and policies relative to the control and response to Congressional correspondence, the Correspondence Management System, and requests for information from other Federal agencies and the general public in order to ensure proper clearances, reviews, and approvals are obtained prior to release; advise management officials of changes in policies and procedures; track regulatory packages through the formal review and clearance process; analyze substantive information in responses to Congressional inquiries on issues of potential controversy and provides recommendations to management officials on how to handle difficult situations.</p>	
63055005 OAR/Community & Tribal Programs Group	Communications Specialist GS-301-09 PD#00071824	<p>The duties are very similar to the GS-11 (PD#0064375) in the same office and to the GS-13 (PD#0047805) in the Chief of Staff Office.</p> <p>This position handles FOIA requests for the Group, congressional</p>	<p>The FOIA is likely the two-grade interval, grade-controlling work—provided it is performed for 25% or more of the time.</p> <p>The PD has a percentage of 30% but has congressional correspondence lumped in with it. Most other tasks appear to be one-</p>

		<p>correspondence, releasing Government information, and other clerical work.</p> <p>Concerns with PD of Record:</p> <p>-The PD states that the incumbent "makes critical substantive decisions relative to the development of appropriate strategies for response" and "provides guidance and assistance to managers in establishing, developing, and implementing these strategies." The exact same verbiage is in the GS-11(PD#0064375) position in the same Group and also in the GS-13 job (PD#0047805) in the Chief of Staff Office. There are a few differences. The GS-9 handles FOIA requests for the Group; the GS-11 for the Division (of which this Group is a part, and the GS-11 is on the staff of the Group); and the GS-13 handles FOIA requests for OTAQ. The GS-11 and GS-13 positions attend Agency FOIA policy meetings; participate in developing new policy guidance for various offices to use; develop monitoring and routing procedures; sometimes draft responses to FOIA requests. The GS-9 does not perform these additional tasks.</p> <p>-Factor 1 states that the position requires "Comprehensive knowledge of the Agency's planning, programming, and budgeting regulations and requirements of Federal and Agency administrative laws in order to facilitate effective program planning and program operations." There is not anything in the duties of the job to support this. The position does not have planning, programming, or budgeting responsibilities. Recommend this is deleted/updated.</p> <p>-The following knowledge is required, is not included in Factor 1, and needs to be added: Knowledge of the regulations, policies, and rules pertaining to the release of information under FOIA sufficient to research, analyze, and evaluate information for response to requests; assemble and review proposed FOIA release packages; to advise management officials on how to properly handle difficult situations.</p> <p>Knowledge of internal protocols and policies relative to the control and response to Congressional correspondence, the Correspondence Management System, and requests for information</p>	<p>grade-interval in nature. At least half of the total position involves releasing government information in one form or another.</p> <p>It is recommended that the PD is revised to address the concerns listed and to reflect appropriate knowledge requirements.</p> <p>The position can be classified in the GS-306 series.</p>
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<p>64011100 OAR/Chief of Staff</p>	<p>Program Analyst GS-343-13 PD#0047805</p>	<p>Position serves as principal POC for Congressional correspondence, manages the Correspondence Management System for OTAQ; functions as liaison between OTAQ and other organizations and public in response to requests for information; manages FOIA requests for the Division; serves as records management coordinator for OTAQ; serves as POC for production of paperwork on HR matters.</p> <p>Concerns with PD of Record: -It is unclear what the GS-343 work is in this position. The work of this position does not involve performing analyses of program data in order to assess the efficiency and effectiveness of government programs carried out by OTAQ. Classification of this position to the GS-343 series is in question as written.</p> <p>-Most of the major duty statements are verbatim copies of the duty statements in PD # 0064375, which is classified as a GS-11. The only duty differences: serving as records management coordinator and producing HR paperwork for personnel actions, are, to a large if not all extent, clerical in nature and not equivalent to the GS-13 level. The grade of this job is questionable.</p> <p>-Factor 1 of the PD states: The work requires expert knowledge of programs related to Federal, state, and local regulations, environmental science concepts, theories, practices and techniques relative to mobile source air pollution control. This knowledge is used to develop important public policies and/or programmatic outreach materials. Detailed knowledge of public communications and outreach experience in effectively dealing with the news media and the public is required. This position does not have anything to do with mobile sources of air pollution control and does not require "expert" knowledge of programs, regulations, environmental science concepts, theories, practices and techniques to deal with it. The job does not have responsibilities for "developing important</p>	<p>The PD is not accurate to be properly evaluated. Based on the duty content, it is misclassified as a Program Analyst, GS-343-13. There is not program analysis work within the major duties and the factor level descriptions are not supported by the duty statements.</p> <p>Given the duties that are in the position, it is covered by the GS-306 series; however, it should be graded the same as its counterpart in the Community & Tribal Programs Group, PD#0064375, as a GS-11, because the differences are negligible.</p> <p>Recommend a re-write of the position description to reflect work being performed and work to support the grade level.</p>

		<p>public policies,” and there is nothing in the duties that deals with the news media.</p> <p>-Factor 2 (level 2-5) is in question. Level 2-5 describes a level of “extraordinary independence,” which does not fit with the type of work performed in this position. It is unclear why “recommendations” made by this position would be evaluated for “availability of funds and other resources, broad program goals, and national priorities” The work done does not lend itself to review of that nature.</p> <p>-Factor 3 is also not accurate. It states that “Guidelines are generally broad and nonspecific.” That is not accurate for the type of work performed. There are numerous guidelines, procedures, protocols, etc. for all of the functions performed.</p> <p>-Factor 4—Nothing about this FLD applies to this position. Assignments are not complex, controversial, and have unconventional features. The work does not “involve distilling national goals, objectives, and priorities into regional/office/laboratory application.” Likewise, features such as “economic considerations, technology feasibility, health effects, cost/benefit” do not apply to the work of this position.</p> <p>-Factor 5 states that “The purpose of this work is to analyze and evaluate major mobile source regulatory actions of substantive mission-oriented programs.” This position does not have responsibility for analyzing and evaluating regulatory actions concerning mobile sources of air pollution.</p> <p>- Factor 7 states that “contacts are for purposes of explaining complicated regulations and Agency actions.” Nothing in the duty statements supports this.</p>	
64056000 OAR/State Measures and Transportation	Administrative Specialist GS-301-13 PD#0005691	Position does have FOIA responsibility; however these duties are not the primary focus of the position. No change in series is required.	Standards citation annotated on PD

Application of Government Information Series, 306

Org. Code/Name	Empl; Posn; PD #	Preliminary Comments/Action Taken	Action Needed/Completed
OITA	NA	There were no positions found that addressed work related to the 306 series	No action required

Application of Government Information Series, 306

Org. Code/Name	Empl; Posn; PD #	Preliminary Comments/Action Taken	Action Needed/Completed
<p>41012200 OW/Organizational Support Service</p>	<p>Lead Communications Specialist GS-301-13 PD#0007472</p>	<p>Position has responsibility for planning, designing, and executing information management services for OW.</p> <p>Specific duties consist of:</p> <ul style="list-style-type: none"> -Serving as Team Leader. (Note: A leader checklist was attached indicating the position performs the minimum leader duties for 25% of the time over one GS-301-12 Communications Specialist. -Serves as the OW quality control officer over classified and non-classified but sensitive info IAW NSI standards. -Serves as lead FOIA manager for OW; receives FOIA requests; assigns to appropriate program office; tracks and follows-up for timeliness or transfer to another EPA component; keeps staff informed of changes in FOIA policies and procedures and distributes written guidelines. -Serves as OW Information Collection Request coordinator -Prepares reports on status of information requests and correspondence, including info on frequency and occurrence of specific subjects, individuals/groups making requests, overdue responses, etc.; includes status of regulatory and non-regulatory documents, guidance documents, Red Border documents, reports to Congress, etc. -Serves as OW Records Liaison Officer -Serves as OW Product Review/Printing Officer for OW publications. <p>Concerns with the PD of Record:</p> <ul style="list-style-type: none"> -This duty statement is vague and does not address much to support what is being performed: Performs expert specialized duties in a defined function or program area involving a wide variety of problems or situations (what are the specialized duties?); 	<p>The responsibilities of this position are of the nature of work covered by the GS-306 Government Information series.</p> <p>The PD needs to be updated for final evaluation.</p>

		develops and evaluates information from various sources, identifies interrelationships, and takes action consistent with objectives of the function or program concerned with analysis of subject-matter processes or problems and development of solutions. Recommend the duty statement is updated.	
41012200 OW/Organizational Support Service	Program Analyst GS-343-13 PD#00061914	Reviews, edits, and processes FOIA; however, this is only a small part of the position's overall responsibilities. No change in series is required.	Standards citation annotated on PD
45011001 OW/Immediate Office Wetlands, Ocean, & Watersheds	Program Analyst GS-343-13 PD#00064400	Serves as back-up to FOIA; however, this is only a small part of the position's overall analyst responsibilities. No change in series is required.	Standards citation annotated on PD
46011000 OW/Immediate Office Groundwater & Drinking	Program Analyst GS-343-13 PD#00043947	Manages requests and renewals of information collection. Does have some FOIA responsibilities; however, these duties are not the overall aspects of the position's overall program analyst responsibilities. No change in series is required.	Standards citation annotated on PD